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March 30, 2015

Honorable Richard J. Sullivan
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

By Email and CM/ECF

Re: Penshurst Trading Inc. d/b/a Juliska v. Zodax L.P.
No. 1:14-cv-02710-RJS

Subject: Request for Filing Two Videos as Exhibits for Defendant Zodax's Motion for Attorney Fees

Dear Judge Sullivan:

We are counsel for defendant Zodax L.P ("Zodax"). The court has permitted Zodax to file its motion for attorney fees by March 31, 2015. Zodax hereby requests permission from the court to file two videos as exhibits for Zodax's motion for attorney fees. The videos are publicly available, and Zodax copied the videos from YouTube's website. The videos show Juliska's president, David Gooding, describing his glassware collections and also describing how these items are manufactured. The accused items in this case are glassware items, and these videos are relevant to Juliska's trademark, trade dress and copyright claims.

Therefore, Zodax hereby requests permission to file these two videos as exhibits for its motion for attorney fees.

Sincerely,

SoCal IP Law Group LLP

[/M. Kala Sarvaiya/](#)

M. Kala Sarvaiya

cc: All Counsel of Record (*via ECF*)